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November 14, 2023

VIA ECF

The Honorable Tonianne J. Bongiovanni, U.S.M.J.
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

Re: *Lasche v. State of New Jersey, et al.*
Civil Action No. 3:18-cv-17552

Dear Judge Bongiovanni:

This office represents Defendants the State of New Jersey, the New Jersey Department of Children and Families, Kyle Higgins, Mary Lippencot, Katie Epperly, Janelle Clark and Christine Norbut Beyer ("State Defendants") in the above-captioned matter.

This letter serves to update Your Honor on the parties' settlement discussions. The parties are making progress toward settlement. Since the last update to the Court the Plaintiffs provided a counter proposal that the State Defendants are considering. However, State Defendants need to internally consult regarding the proposal and an individual necessary for deliberations was away on vacation and not returning until this week. As such, the parties request additional time until December 8, 2023 to provide the Court with an update.

Thank you for Your Honor's time and consideration of this matter.



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Respectfully submitted,

MATTHEW J. PLATKIN
ATTORNEY GENERAL OF NEW JERSEY

By: /s/ Phoenix N. Meyers
Phoenix N. Meyers
Deputy Attorney General
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cc: Counsel of Record (via CM/ECF)

So Ordered this 15th day
of November, 2023.
